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FILED

JAN 07 2020

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

CLERK U.S. DISTRICT COURT
WEST. DIST. OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

QUARUAN CHANCE

Criminal No. 20-2

(21 U.S.C. §§ 841(a)(1) and
841(b)(1)(B)(ii))

INDICTMENT

COUNT ONE

The grand jury charges:

On or about December 30, 2019, in the Western District of Pennsylvania, the defendant, QUARUAN CHANCE, did knowingly, intentionally, and unlawfully possess with intent to distribute 500 grams or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(ii).

FORFEITURE ALLEGATION

1. The allegations contained in Count One of this Indictment are hereby re-alleged and incorporated by reference, as though fully set forth herein, for the purpose of alleging forfeiture pursuant to Title 21, United States Code, Sections 853(a)(1), 853(a)(2), and 853(p).

2. Pursuant to Title 21, United States Code, Section 853, upon conviction of an offense in violation of Title 21, United States Code, Section 841(a)(1), the defendant, QUARUAN CHANCE, shall forfeit to the United States of America any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offense and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the offense. The property to be forfeited includes, but is not limited to, the following:

a. A black 2019 Jeep Grand Cherokee, bearing New York registration JFH7024 and VIN 1C4RJFBG1KC595945, registered to Jamel M. Boone at 17 Marina Road, Island Park, New York 11558; and

b. A quantity of United States Currency seized from the person of QUARUAN CHANCE and from the aforementioned 2019 Jeep Grand Cherokee on December 30, 2019.


3. If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been comingled with other property which cannot be divided without difficulty;

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

A True Bill,


Foreperson


SCOTT W. BRADY
United States Attorney
PA ID No. 88352